

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
                  v.                                ) No. 03-CR-10385-RGS  
  )  
Kirk Rinaldi                                    )  
  )  
  )

**ASSENTED-TO MOTION TO CONTINUE TRIAL DATE**

The United States, with the assent of the defendant, moves to continue the trial date to June 16,2008.In support of its motion, the government states the following.

1. This case has just been reassigned to the undersigned Assistant U.S. Attorney. (Because of the rescheduling of a trial in another case, the Assistant U.S. Attorney previously assigned to the case is now unavailable to try this case on the previously scheduled date). The undersigned AUSA has other case responsibilities which make it impossible for him to try the case during May,2008.

2. In addition, the defendant has recently asked the government for additional discovery items and has requested the undersigned AUSA to take additional steps to insure that the government confirm that it has produced all previously requested discovery (and any additional discovery) sufficiently in advance of trial. The additional time requested is necessary for the

government to accommodate those requests. The additional time is also necessary for the government to adequately prepare for trial.

3. The defendant assents to the motion.

4. The requested continuance is only for four weeks.

5. The parties request that time be excluded from May 19, 2008 through June 16, 2008.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/Christopher F. Bator  
Assistant U.S. Attorney

Assented-to:  
Kirk Rinaldi  
by his counsel,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served by electronic filing upon all counsel of record.

/s/Christopher F. Bator  
Christopher F. Bator  
Assistant U.S. Attorney  
Date: April 25, 2008

